

REMARKS

In the Final Office Action mailed January 24, 2004, the Examiner rejected claims 2-4, 6-15, 17-25, 27-29, 31-41 and 43-55 under 35 U.S.C. §103(a) as allegedly being unpatentable over US Patent Application Publication No. 2003/0033317 to Ziglin in view of US Patent No. 6,463,585 to Hendricks et al.

In the present preliminary amendment, Applicants respectfully traverse the §103(a) rejections with the following arguments.

35 U.S.C. §103(a)

The Examiner rejected claims 2-4, 6-15, 17-25, 27-29, 31-41 and 43-55 under 35 U.S.C. §103(a) as allegedly being unpatentable over US Patent Application Publication No. 2003/0033317 to Ziglin in view of US Patent No. 6,463,585 to Hendricks et al.

Claims 2-4, 27-29, and 53

Applicants respectfully contend that claims 4, 29, and 53 are not unpatentable over Ziglin in view of Hendricks, because Ziglin in view of Hendricks does not teach or suggest each and every feature of claim 4. For example, Ziglin in view of Hendricks does not teach or suggest the feature: "generating the Aspect file through use of data derived from a dataset, said generating using a first operating system, said Aspect file not readable by the SAP business information system only because the SAP business information system is functioning within a second operating system that differs from the first operating system; converting the Aspect file into a Temp file that is readable by the SAP business information system".

The Advisory Action mailed 04/19/2005 argues that "generating the Aspect file" in disclosed in Ziglin through conversion by the layering program 118 into the format of the of the new enterprise database 134.

In response, Applicants contend that once the alleged Aspect is generated in the format of the of the new enterprise database 134, no further conversion of the Aspect file occurs. In contrast, claims 4, 29, and 53 require another conversion to occur, namely to a Temp file to resolve an inconsistency between the operating system that generated the Aspect file and the operating system in which the SAP business information system is functioning. Applicants

maintain that Ziglin in view of Hendricks does not teach or suggest the preceding feature of 4, 29, and 53.

Based on the preceding arguments, Applicants respectfully maintain that claims 4, 29, and 53 are not unpatentable over Ziglin in view of Hendricks, and that claims 4, 29, and 53 are in condition for allowance. Since claims 2 and 3 depend from claim 4, Applicants contend that claims 2 and 3 are likewise in condition for allowance. Since claims 27 and 28 depend from claim 29, Applicants contend that claims 27 and 28 are likewise in condition for allowance.

Claims 6-15, 17-25, 31-41, and 54-55

Applicants respectfully contend that claims 10, 23, 35, 49, and 54-55 are not unpatentable over Ziglin in view of Hendricks, because Ziglin in view of Hendricks does not teach or suggest each and every feature of claims 10, 23, 35, 49, and 54-55.

As a first example of why Ziglin in view of Hendricks does not teach or suggest each and every feature of claims 10, 23, 35, 49, and 54-55, Ziglin in view of Hendricks does not teach or suggest the feature: "wherein each rollup record has a unique rollup keyvalue".

The Examiner alleges that Hendricks, col. 70, lines 40-56 discloses the rollup record of claims 10, 23, 35, 49, and 54-55. Applicants note that in Hendricks, col. 70, lines 40-56, the alleged keygroup is the combination of program category and time slot. However, Hendricks does not teach or suggest that each alleged rollup record has a unique rollup keyvalue (i.e., a unique combination of program category and time slot). In fact, Hendricks teaches exactly the opposite. See Hendricks, col. 70, lines 51-53, reciting that "all programs watched in a particular category and time slot will be entered into the programs watched matrix." If claims 10, 23, 35,

49, and 54-55 were implemented in Hendricks, no more than one record having the same program category and time slot would appear, and multiple records corresponding to a multiplicity of different programs having the same program category and time slot would not appear. Therefore, Hendricks does not teach or suggest the preceding feature of claims 10, 23, 35, 49, and 54-55.

As a second example of why Ziglin in view of Hendricks does not teach or suggest each and every feature of claims 10, 23, 35, 49, and 54-55, Ziglin in view of Hendricks does not teach or suggest the feature: "an Aspect file having rollup records, ... wherein each rollup record has a ... quantity field, ... and wherein the quantity field stores the number of dataset records that have the same rollup keyvalue".

In response, Applicants notes that the Examiner has not identified a quantity field in Hendricks, col. 70, lines 40-56, and Applicants contend that no such quantity field is disclosed in Hendricks. In the absence of any such identification by the Examiner, Applicants assume that the Examiner considers "the number of programs watched for a given time slot" (disclosed in Hendricks, col. 70, lines 40-56) to be the alleged "quantity field". However, "the number of programs watched for a given time slot" is used only as a counter to implement the building of a programs watched matrix in step 432 of FIG. 29 (see Hendricks, col. 70, lines 48-51). Hendricks does not disclose that "the number of programs watched for a given time slot" is comprised by a rollup record of a file (i.e., an Aspect file), as required by claims 10, 23, 35, 49, and 54-55.

Based on the preceding arguments, Applicants respectfully maintain that claims 10, 23,

35, 49, and 54-55 are not unpatentable over Ziglin in view of Hendricks, and that claims 4, 29, and 53 are in condition for allowance. Since claims 6-9 and 11-15 depend from claim 10, Applicants contend that claims 11-15 are likewise in condition for allowance. Since claims 17-22 and 24-25 depend from claim 23, Applicants contend that claims 17-22 are likewise in condition for allowance. Since claims 31-34 and 36-41 depend from claim 35, Applicants contend that claims 31-34 and 36-41 are likewise in condition for allowance. Since claims 43-48 and 50-52 depend from claim 49, Applicants contend that claims 43-48 and 50-52 are likewise in condition for allowance.

Additional Arguments For Selected Dependent Claims

In addition with respect to claims 3, 8, 18, 28, 33, and 44, Ziglin in view of Hendricks does not teach or suggest the feature: "wherein the dataset is a SAP-formatted dataset". The Examiner alleges that the database 96 comprises the dataset. However, there is no disclosure in Ziglin that the database 96 contains any SAP-formatted data.

In addition with respect to claim 6 and 31, Ziglin in view of Hendricks does not teach or suggest the feature: "wherein the bridge program is further adapted to cause the rollup records in the generated Aspect file to be sorted with respect to the keygroup". The Examiner's citation of FIGS. 12 and 15 of Hendricks is not persuasive, because Hendricks does not teach anywhere the sorting of rollup records.

In addition with respect to claims 9 and 34, Ziglin in view of Hendricks does not teach or suggest the feature: "wherein the bridge program is further adapted to generate a trace file that includes a representative rollup keyvalue of the keygroup and a pointer that points to a portion of the dataset, said portion being correlated with the representative rollup keyvalue". The Examiner argues that "the bridge program is further adapted to generate a trace file [Hendricks: target sequence] that includes a representative rollup keyvalue [Hendricks: highest priority weighted group] of the keygroup and a pointer that points to a portion of the dataset, said portion being correlated with the representative rollup keyvalue [Hendricks: See column 70, line 57 et seq.]" In response, Applicants do not find the phrase "target sequence" in Hendricks, col. 70, line 57 et seq., but do find "advertising target sequencing 374 of FIG. 28" in Hendricks, col. 71, lines 1-2. However, reference numeral 374 in FIG. 28 of Hendricks refers to the sequence of steps in the flow chart of FIG. 28, which is unrelated to the preceding feature of claim 9 and most certainly does not disclose, for example, the "trace file" and "pointer" of the preceding feature of claim 9. In effect, the Examiner has not explained how the so-called "target sequence" teaches or suggests the preceding claimed feature.

In addition with respect to claims 12 and 37, Ziglin in view of Hendricks does not teach or suggest the feature: "wherein to identify the select records includes to accept as input a first date and a second date, wherein the first date is earlier than the second date, and wherein the selection rules do not permit identifying as a select record any record of the dataset having an effective date that is earlier than the first date or later than the second date". The Examiners argument of combining Hendricks, col. 40, lines 44-56 with Hendricks, col. 70, lines 40 - col. 71,

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line 10 is not persuasive, because these respective portions of Hendricks are not combinable with respect to the preceding feature of claim 12. Hendricks, col. 40, lines 44-56 pertains to the scheduling of data traffic, whereas Hendricks, col. 70, lines 40 - col. 71, line 10 pertains to the organization and weighting of watched program information. The preceding combining, by the Examiner, of said unrelated portions of Hendricks is not persuasive, and is not unlike applying the scheduling of airplane traffic to making a decision as to what the next offensive play might be in a football game.

In addition with respect to claims 14-15, 24-25, 39-40, and 50-51, Ziglin in view of Hendricks does not teach or suggest the features: "wherein the report relates to procurement data, and wherein the rollup records include the procurement data" (claims 14, 24, 39, 50); and "wherein the procurement data is selected from the group consisting of purchase order data, invoice data, and a combination thereof" (claims 15, 25, 40, 51). The Examiner argues that the preceding feature is disclosed in "the Background, Summary, and Detailed Descriptions of both Ziglin and Hendricks". In not being able to cite anything specific in Ziglin and/or Hendricks, Applicants conclude that the Examiner was unable to find the preceding claimed features in Ziglin and/or Hendricks. Moreover, the Examiner did not offer evidence from the prior art to support the preceding modification of Ziglin by Hendricks.

In addition with respect to claims 20 and 46, Ziglin in view of Hendricks does not teach or suggest the feature: "N bridge programs" combined with "said N at least 2" from claim 23 and 49, respectively. The Examiner identified only one bridge program in Ziglin, namely the layering

program 118. In fact, the Examiner has not even addressed the issue of the preceding claimed features.

In addition with respect to claims 21 and 47, Ziglin in view of Hendricks does not teach or suggest the feature: "wherein the datasets D_1, D_2, \dots, D_N have formats F_1, F_2, \dots, F_N , respectively, and wherein the at least one bridge program consists of one bridge program having logical paths L_1, L_2, \dots, L_N respectively keyed to the formats F_1, F_2, \dots, F_N for respectively generating the Aspect files A_1, A_2, \dots, A_N ." combined with "said N at least 2" from claims 23 and 49, respectively. The Examiner has not even addressed the issue of the preceding claimed features.

In addition with respect to claims 41 and 52, Ziglin in view of Hendricks does not teach or suggest the feature: "making a query to sum over the quantity field for a subset of the rollup records of the Temp file". The Examiner argues: "making a query to sum over the quantity field for a subset of the rollup records of the Temp file [Hendricks: Column 70, line 40 - Column 71, line 10]". In response, Applicants respectively contend that there is no disclosure of said "making a query to sum over the quantity field" in Hendricks, col. , line 40 - col. 71, line 10". If the Examiner is referring to the disclosure of "a sum of squares algorithm may be used to determine the weighting" in Hendricks, cols. 59-60, Applicants would point out that a sum of squares algorithm to determine the weighting is totally unrelated to "making a query to sum over the quantity field", as is well known in the art of applied mathematics.

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CONCLUSION

Based on the preceding arguments, Applicants respectfully believe that all pending claims and the entire application meet the acceptance criteria for allowance and therefore request favorable action. If the Examiner believes that anything further would be helpful to place the application in better condition for allowance, Applicants invites the Examiner to contact Applicants' representative at the telephone number listed below. The Director is hereby authorized to charge and/or credit Deposit Account No. 09-0457.

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